

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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CHAD PELISHEK,

Plaintiff

v.

Case No. 2:23-CV-1048

CITY OF SHEBOYGAN, et al.,

Defendants.

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**SECOND DECLARATION OF JENNIFER DEMASTER IN RESPONSE TO  
THE COURT’S SHOW CAUSE ORDER AND DEFENDANTS’ REPLY**

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I, Jennifer DeMaster, hereby declare the following:

1. At the time I decided to purchase Westlaw Precision package in late Fall 2024, I was never told that the Quick Check tool I purchased would use generative artificial intelligence. I believed I was using traditional Westlaw tools used by courts and attorneys across the nation and was upgrading from my prior “Casetext” platform to be better equipped.

2. I have never heard of “generative artificial intelligence” until reviewing information relating to this Court’s show cause order and the Order from Judge Wang in Colorado. I have never been aware there was any distinction between basic “AI tools” that helped expedite legal research and “generative AI.” I had never used AI or any type of artificial intelligence before learning of its uses by federal courts, judges, and attorneys in late 2024 when searching for a better legal research platform.

3. In searching emails to see whether I received other “GAI” related emails from legal sources, I came across a Wisconsin Bar CLE course on using AI in the legal profession, including for research. I signed up for that course and will be taking it on August 22, 2025.

4. I provided and showed all my Westlaw emails and CLE course verification to Mr. Kachouroff to verify, and I affirm that Exhibits B, C, D, and G to Mr. Kachouroff’s Declaration are true and correct copies of my emails, contract, and receipt.

5. Prior to seeking cancellation of my Westlaw Quick Check Tool, I ran the Judicial Comparison tool of Defendants Summary Judgment briefing, along with my opposition and received this result. It can be viewed here: <https://attorneys.egnyte.com/dl/4yFWfTJHfdKg>. I also ran and downloaded other results from checks of briefs I had previously run but did not save and can provide those on request.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on August 20, 2025.

/s/ Jennifer T. DeMaster  
Jennifer T. DeMaster